

This form will report compliance with your permit as determined by an NRW officer

Site	Wastesavers Resource Centre	Permit Ref	AB3191ZE		
Operator/Permit holder	Wastesavers Limited				
Regime	Waste Operations				
Date of assessment	04/07/2018	Time in	10:30	Out	11:45
Assessment type	Audit				
Parts of the permit assessed	All				
Lead officer's name	Lee, Jonathan				
Accompanied by	Moggridge, Lara				
Recipient's name/position	Ian Syms/ Technically Competent Manager	Date issued	16/07/2018		

Section 1 – Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations or the licence under the Water Resources Act 1991 as amended by the Water Act 2003. A detailed explanation is captured in "Compliance Assessment Report Detail" (Section 2) and any actions you may need to take are given in the "Action(s)" (section 4). This summary details where we believe any non-compliance with the permit has occurred, the relevant condition and how the non-compliance has been categorised using our Compliance Classification Scheme (CCS). CCS Scores can be consolidated or suspended where appropriate, to reflect the impact of some non-compliances more accurately. For more details of our CCS scheme, contact your local office.

Permit conditions and compliance summary	CCS Category	Condition(s) breached
A1 - Specified by permit	C4	2.3.1
B3 - Infrastructure - Site drainage engineering (clean and foul)	A	
B4 - Infrastructure - Containment of stored materials	A	
B5 - Infrastructure - Plant and equipment	A	
C1 - General Management - Staff competency/training	A	
C2 - General Management - Management system and operating procedures	A	
C3 - General Management - Materials acceptance	A	
C4 - General Management - Storage, handling labelling and Segregation	A	
D1 - Incident Management - Site security	A	
D2 - Incident Management - Accidents, emergency and incident planning	A	
E1 - Emissions - Air	A	
E2 - Emissions - Land and groundwater	A	
E3 - Emissions - Surface water	A	
E4 - Emissions - Sewer	A	
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	A	

KEY: See Section 5 for breach categories, suspended scores will be indicated as such.
A = Assessed or assessed in part (no evidence of non-compliance), **X** = Action only,
O = Ongoing non-compliance, not scored.

Number of breaches recorded	1	Total compliance score (see section 5 for scoring scheme)	0.1
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If the Number of breaches recorded is greater than zero, please see Section 3 for our proposed enforcement response

Section 2 – Compliance Assessment Report Detail

This section contains a report of our findings and will usually include information on:

- The part(s) of the permit that were assessed (eg. Maintenance, training, combustion plant, etc)
- Where the type of assessment was 'Data Review' details of the report/results triggering the assessment
- Any non-compliances identified
- Any non-compliances with directly applicable legislation
- Details of any multiple non-compliances
- Information on the compliance score accrued inc.
- Details of advice given
- Any other areas of concern
- Any actions requested
- Any examples of good practice
- A reference to photos taken

Introduction

Officers Jonathan LEE and Lara MOGGRIDGE visited Wastesavers Limited, Esperanto Way, Newport on Wednesday 4th July 2018 to complete an audit of **EPR-AB3191ZE**. It was sunny and dry at the time of the visit. Met with Ian Syms, the Technically Competent Manager on site. The site was operational at the time of the visit.

The visit was made to complete a detailed inspection of the operational activities on site, fire prevention plan and training of staff. Completing an audit of the site allows Natural Resources Wales to identify any issues with all elements of the site. An inspection of documentation and site infrastructure was completed. Prior to the visit, a review of previous breaches at the site was completed. Previous breaches have been limited to Category 4 breaches for the non-submission of waste returns.

Compliance

Competent persons

The permit requires the operator to manage activities on site using sufficient competent persons. The training procedures of staff was reviewed as part of the audit. Ian detailed the induction process for new starters and showed up to date training records for all the staff employed. The training sessions covered a wide range of site topics including health and safety, fire procedures, reporting site accidents and so on. Ian stated that all new starters are required to complete the mandatory units when employment commences, and that refresher/extended training is rolled out to employees when appropriate.

Ian also informed us that monthly communication meetings are held on site with all staff, which gives employees an opportunity to raise any issues or need for training. A recent incident was logged off site by one of the vehicles which had spilt hydraulic oil. This was raised in the monthly meeting and actions were taken to provide spill kits within all vehicles and operatives were trained in their use.

Technically Competent Manager Ian Syms displayed WAMITAB certification of competence on site, passed in November 2017.

Fire Prevention Plan

The permit for the site does not have a modern requirement for a Fire Prevention and Mitigation Plan (FPMP). However, it is detailed within Table S1.2 Operating techniques that the site is managed in accordance with 'Section 5. Reducing the risk of fire' of the Fire Management Plan document WSFMP001.

At the time of the inspection the operator was having operational difficulties with the onward transfer of cardboard from the site. This has resulted in a significant stockpile of baled cardboard, which was clearly in excess of the 50 bale limit specified within WSFMP001.

You have been scored a **Category 4 Breach** for exceeding the tonnage/bale limit as stated within 'Section 5.1.2 Cardboard' of your Fire Management Plan document.

Action: Please adhere to the 50 bale limit of baled cardboard on site.

All other specified elements of the fire management plan were viewed as compliant at the time of inspection. The site has 24-hour security provision and fire detection systems, this significantly reduces the threat of potential arson or security breach on site. Perimeter of the site was secure at the time of inspection.

Hazardous waste consignment notes

The site is permitted for the treatment of waste electrical equipment (WEEE), limited to bulking up and onward transfer. Items are typically small domestic appliances which are transferred to SIMS Metal Recycling. Hazardous waste consignment notes were inspected, of which there were some issues with correct completion. Some notes showed waste details, hazard codes and consignee details.

Please ensure that these notes are completed correctly by all parties (including carrier and consignee). For reference, detailed guidance can be found at the link below:

<https://www.gov.uk/guidance/hazardous-waste-consignment-note-supplementary-guidance>

Operational Activities

Separator and baler operational at time of inspection. Loose waste and subsequent baled units of separated waste fractions stored within appropriate bays.

No issues with drainage or impermeable surface at time of inspection.

No issues with the submission of waste returns, thank you for submitting these on time.

Other comments

If you have any issues with this report or have any further queries, please contact Jonathan Lee on 0300 065 3908 or jonathan.lee@cyfoethnaturiolcymru.gov.uk

Thank you for taking the time to show us around the site, I look forward to any further visits.

In this document 'Natural Resources Wales' means the Natural Resources Body for Wales established by Article 3 of the Natural Resources Body for Wales (Establishment) order.

EPR Compliance Assessment Report

**Report ID:
CAR_NRW0033623**

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Site	Wastesavers Resource Centre	Permit Ref	AB3191ZE
Operator/Permit holder	Wastesavers Limited	Date	04/07/2018

Section 3 – Enforcement Response

You must take immediate action to rectify any non-compliance and prevent repetition. Non-compliance with your permit conditions constitutes an offence and can result in criminal prosecutions and/or suspension or revocation of a permit. Please read the detailed assessment in Section 2 and the steps you need to take in Section 4 below.

Section 4 – Action(s)

This section summarises the actions identified during the assessment along with the timescales for when they will need to be completed.

Criteria Ref.	CCS Category	Action required/advised	Due Date
See Section 1 above			
A1	C4	Please adhere to 50 bale limit of cardboard as specified within document WSFMP001	01/08/2018

Section 5 – Compliance notes for the Operator

To ensure you correct actual or potential non-compliance we may

- Advise on corrective actions verbally or in writing
- Require you to take specific actions verbally or in writing
- Issue a notice
- Require you to review your procedures or management system
- Change some of the conditions of your permit
- Decide to undertake a full review of your permit

Any breach of a permit condition is an offence and we may take legal action against you

- We will normally provide advice and guidance to assist you to come back into compliance either after an offence is committed or where we consider that an offence is likely to be committed. This is without prejudice to any other enforcement response that we consider may be required.
- Enforcement action can include the issue of a formal caution, prosecution, the service of a notice and/or suspension or revocation of the permit.

See our Enforcement and Civil Sanctions guidance for further information

This report does not relieve the site operator of the responsibility to

- Ensure you comply with the conditions of the permit at all times and prevent pollution of the environment
- Ensure you comply with other legislative provisions which may apply

Non-compliance scores and categories

CCS category	Description	Score
C1	A non-compliance that could have a major environmental effect	60
C2	A non-compliance which could have a significant environmental effect	31
C3	A non-compliance which could have a minor environmental effect	4
C4	A non-compliance which has no potential environmental effect	0.1

Operational Risk Appraisal (Opra) - Compliance assessment findings may affect your Opra score and/or your charges. This score influences the resource we use to assess permit compliance.

Section 6 – General information

Data protection notice

The information on this form will be processed by the Natural Resources Wales (NRW) to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s). The NRW may also use and/or disclose it in connection with:

- Offering/providing you with its literature/services relating to environmental matters
- Consulting with the public, public bodies and other organisations (eg. Health and Safety Executive, local authorities) on environmental issues
- Carrying out statistical analysis, research and development on environmental issues
- Providing public register information to enquirers
- Investigating possible breaches of environmental law
- Assessing customer service satisfaction and improving its service
- Freedom of Information Act/Environmental Regulations request

The NRW may pass it on to its agents/representatives to do these things on its behalf. You should ensure that any persons named on this form are informed of the contents of this data protection notice.

Disclosure of information

The NRW will provide a copy of this report to the public register(s). However, if you consider that any information contained in this report should not be released to the public register(s) on the grounds of commercial confidentiality, you must write to your local area office within fifteen working days of receipt of this form indicating which information it concerns and why it should not be released, giving your reasons in full.

Customer charter

What can I do if I disagree with this compliance assessment report?

If you are unable to resolve the issue with your site officer, you should firstly discuss the matter with officer's line managers using the informal appeals procedure. If you wish to raise your dispute further through our official Complaints and Commendations procedure, phone our general enquiry number 0300 065 3000 (Mon to Fri 08.00 – 18.00) and ask for the Customer Contact team or send an email to enquiries@naturalresourceswales.gov.uk. If you are still dissatisfied you can make a complaint to the Public Services Ombudsman for Wales. For advice on how to complain to the Ombudsman phone their helpline on 0845 607 0987.

Welsh Language

If you would like this form in Welsh please contact your Regulatory Officer.